UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MEMORANDUM

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

DATE: December 8, 2011

SUBJECT: Science Review in Support of Salicylic Acid Technical, Containing 98.7% Salicylic Acid As Its Active Ingredient.

Decision Number:	439833
DP Number:	396417
EPA File Symbol Number:	34704-RNLT
Chemical Class:	Biochemical
PC Code:	076602
CAS Number:	69-72-7
Active Ingredient Tolerance Exemptions:	Nonfood-use
MRID Numbers:	N/A

FROM: Angela L. Gonzales, Biologist 12/8/11
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

TO: Chris Pfeifer, Regulatory Action Leader
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

ACTION REQUESTED

In response to the Agency's request for additional information discussed in a memorandum from A. L. Gonzales to C. Pfeifer dated November 9, 2011, the applicant has submitted information in an email and attachments to Chris Pfeifer dated November 29, 2011.

RECOMMENDATIONS AND CONCLUSIONS

1. The product chemistry submission is ACCEPTABLE, pending submission and review of the data identified below.

a. Storage stability and corrosion characteristics studies on the MP are required and must be submitted. According to the registrant, these studies are in progress.

NOTE TO RAL:

1. The registrant states in the cover letter dated September 9, 2010 that the proposed MP will be formulated into EPs to be used on seeds that are not meant for human or animal consumption. However, there is no indication of this on the proposed MP label.

STUDY SUMMARIES

Product Chemistry (no MRID)

All previously identified deficiencies have been corrected. The MP will be packaged in plastic-lined cardboard drums. Storage stability and corrosion characteristics studies are in progress according to the registrant.

cc: Angela L. Gonzales, Chris Pfeifer, BPPD Science Review File, IHAD/ARS
A. L. Gonzales, FT, PY-S: 12/8/11